

EXPLANATION/DISCLAIMER FOR CaRFG Q & A's

The following are responses to questions received by the California Air Resources Board (ARB) concerning the way in which the ARB intends to implement and assure compliance with the California Reformulated Gasoline (CaRFG) regulations contained in Title 13, California Code of Regulations, sections 2260-2272. The responses have been prepared by the ARB's Stationary Source, Compliance, and Monitoring & Laboratory Divisions, and its Office of Legal Affairs.

Regulated parties may use the responses as an aid in achieving compliance with the CaRFG program. However, the responses do not alter the requirements of the regulations. While the responses represent the ARB's interpretation and plans for implementation at this time, some responses may change as additional information becomes available or as the ARB further considers pertinent issues.

The responses provided do not establish or change legal rights or obligations. They do not establish binding rules or requirements and are not wholly determinative of the issues of issues addressed. ARB decisions in any particular case will be made applying the law and regulations on the basis of the specific facts and actions.

96-12 Posted March 8, 1996

Question: What test methods for the measurement of CaRFG parameters are allowed to be used as equivalent methods to those methods recently redesignated?

Answer: The following table lists the adopted and equivalent test methods for the CaRFG components whose designated test methods have recently been

amended. It should be noted that certain conditions must be met when using
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10 ppm + ASTM D2622-94 (modified) ASTM D5453-93ng1) "ProposoteStandard T teeMe2
Gas Chromatography/Fourier Transform Infrarnde"ng

Answer: No. Under section 2261(a)(1)(B) of Title 13, California Code of Regulations, the Phase 2 RFG flat and averaging limits for producers and importers apply to imported gasoline supplied from an import facility on and after March 1, 1996. Section 2260(a)(16) provides that:

"Import facility" means the facility at which imported California gasoline is first received in California, including, in the case of gasoline imported by cargo tank and delivered directly to a facility for dispensing gasoline into motor vehicles, the cargo tank in which the gasoline is imported.

Accordingly, when gasoline is imported by cargo tank truck and delivered directly to a retail facility, it is supplied from the "import facility" when it is transferred to the retail facility. All such imported gasoline directly delivered to a California retail outlet on or after March 1, 1996 will have to meet the Phase 2 RFG requirements. The analysis would be the same for deliveries directly to a bulk purchaser-consumer facility.

where gasoline produced at an out-of-state refinery is imported into California by cargo tank truck or other means and is initially delivered to a California terminal or bulk plant, starting March 1, 1996 the gasoline will have to meet the Phase 2 RFG flat and averaging limits when it is supplied from the terminal or bulk plant.

96-10 Posted February 9, 1996

Question: Where a producer is supplying gasoline as a predictive model (PM) alternative gasoline formulation and has generated a credit for one or more properties being averaged, may the producer carry over the credit when the

producer elects to start supplying gasoline subject to a different PM alternative gasoline formulation?

Answer: In most cases, no. Section 2265(c)(3) generally prohibits the use of any previously generated offset credits when a producer elects to supply gasoline as a PM alternative gasoline formulation, and this applies to situations where the producer elects to change from one PM alternative gasoline formulation to another.

There is one exception. The recent "housekeeping" amendments created an exception to the section 2265(c)(2) prohibition against changing from one PM alternative gasoline formulation to another PM alternative gasoline formulation when there are any outstanding debits for any property being averaged. The exception applies where:

"(A) the only changes are either:

1. PM flat limits for one or more properties are changed to PM averaging limits, or
2. a single PM averaging limit for which there are no outstanding requirements to provide offsets is changed to a PM flat limit, and

(B) there are no changes to the PM alternative specifications for the remaining properties, and

(C) the new PM alternative formulation meets the criteria for approval in the Predictive Model Procedures."

The circumstances described in the quoted regulatory text are the only times when a refiner with an outstanding averaging debit for any property

can switch from one PM alternative formulation to a different PM alternative formulation (in such a switch, the averaging limits for the property for which there is a debit cannot be changed). They are thus the only circumstances under which a producer changing PM alternative gasoline formulations will carry over an averaging debit for any property. If the producer carries over averaging debits for one or more properties, implicitly the producer should also carry over averaging credits for other properties (except for any property for which a PM averaging limit is changed to a PM flat limit pursuant to section 2265(c)(2)(A)2.). Accordingly, a producer or importer changing PM alternative formulations in the limited circumstances identified in section 2265(c)(2)(A)-(C) will not lose any offset credits accrued under the previous PM alternative gasoline formulation, except for offset credits for a property for which a PM averaging limit is changed to a PM flat limit pursuant to section 2265(c)(2)(A)2.

96-9 Posted February 9, 1996

Question: Do the CaRFG flat and averaging limits apply to batches of gasoline that are shipped from the production or import facility during a period that starts before or at 12:00 midnight, February 29, 1996 and ends after 12:00 midnight, February 29, 1996?

Answer: No. The ARB will not enforce the CaRFG flat and averaging limits with respect to any final blend of gasoline that the producer or importer starts supplying from the production or import facility before or at 12:00 midnight, February 29, 1996. Any such final blend will not be subject to averaging and will not be considered to have generated either credits or debits under the averaging provisions. The CaRFG standards imposed on gasoline when it is supplied from the production or import facility apply to all final blends of gasoline that are supplied from the production or import

facility starting after 12:00 midnight, February 29, 1996.

96-8 Posted February 9, 1996

Question: My understanding of RVP requirements during the March 1 through June 1996 CaRFG Phase in period is as follows:

CaRFG supplied from a production or import facility for use in Northern California, with the exception of those areas identified below, must be compliant with the 7.00 psi RVP requirement effective April 1, 1996.

CaRFG supplied from a production or import facility for use in the North Central Coast Air Basin, South Central Coast Air Basin (excluding Ventura County), North Coast Air Basin, Lake County Air Basin, or Northeast Plateau Air Basin, must be compliant with the 7.00 psi RVP requirement effective May 1, 1996.

CaRFG supplied from a production or import facility for use in Southern California must be compliant with the 7.00 psi RVP requirement effective March 1, 1996.

CaRFG supplied from a terminal facility for use in Northern California, with the exception of those areas identified below, must be compliant with the 7.00 psi RVP requirement effective May 1, 1996.

CaRFG supplied from a terminal facility for use in the North Central Coast Air Basin, South Central Coast Air Basin (excluding Ventura County), North Coast Air Basin, Lake County Air Basin, or Northeast Plateau Air Basin, must be compliant with the 7.00 psi RVP requirement effective June 1, 1996.

CaRFG supplied from a terminal facility for use in Southern California must be compliant with the 7.00 psi RVP requirement effective April 15, 1996.

All CaRFG offered for sale or supply after June 1, 1996 and before the end of the respective summer control period must be compliant with the 7.00 psi RVP requirement.

Southern California is defined as in section 2262.1(b)(2)(A). Northern California is defined as in section 2262.1(b)(2)(B).

It is further understood that all prior California RVP requirements are superseded by the Ca. Phase II requirements outlined above. That is to say, beginning March 1, 1996, Ca. Phase II requirements are the only California requirements in force.

Answer: Your understanding is generally, but not altogether, correct. The compliance dates for production or import facilities, and for terminal facilities, are determined by the location of the facility, not the location where the gasoline will ultimately be used. However, in some cases there are exceptions from these compliance dates, where the entity supplying the gasoline from the production, import or terminal facility can make certain demonstrations about subsequent downstream deliveries of the gasoline.

In this answer, the term "earlier northern air basins" is used to describe the air basins identified in section 2262.1(b)(2)(B): the San Francisco Bay Area, San Joaquin Valley, Sacramento Valley, Great Basin Valley, Mountain Counties and Lake Tahoe Air Basins. The term "later northern air basins" is used to describe the air basins identified in section 2261(b)(2)(C): the North Central Coast, South Central Coast (excluding Ventura County), North Coast, Lake County, and Northeast Plateau Air Basins. The term "Southern California" is used to describe the South

Coast, San Diego, and Southeast Desert Air Basins and Ventura County. The term "dispensing facility" is used to describe a retail service station and a bulk purchaser-consumer's fueling facility.

Gasoline being supplied from a production or import facility

(a) Gasoline being supplied from a production or import facility in an earlier northern air basin must meet the 7.00 psi RVP standard starting April 1, 1996, with one exception (sec. 2262.1(b)).

The exception, found in section 2262.1(c)(2), allows higher RVP gasoline to be supplied during April from a production or import facility in an earlier northern air basin if the producer or importer demonstrates it took reasonably prudent precautions to assure that the gasoline will be delivered to a dispensing facility in a later northern air basin before May 1.

(b) Gasoline being supplied from a production or import facility in a later northern air basin must meet the 7.00 psi RVP standard starting May 1, 1996.

(c) Gasoline being supplied from a Southern California production or import facility must meet the 7.00 psi RVP standard starting March 1, 1996. (sec. 2262.1(b)). As in the Northern California situation, section 2262.1(c)(2) creates an exception where the producer or importer demonstrates it took precautions to assure that the gasoline will be delivered to a dispensing facility in an earlier northern air basin before April 1, or in a later northern air basin before May 1.

Gasoline being supplied from a terminal facility

(d) Gasoline being supplied from a terminal in an earlier northern air basin must meet the 7.00 psi RVP standard starting May 1, 1996 (sec.

2262.1(a)), with the one exception in section 2262.1(c)(1). This exception allows higher RVP gasoline to be supplied during May from a terminal in an earlier northern air basin if the entity supplying the gasoline from the terminal demonstrates it took precautions to assure that the gasoline will be delivered to a dispensing facility in a later northern air basin before June 1.

(e) Gasoline being supplied from a terminal in a later northern air basin must meet the 7.00 psi RVP standard starting June 1, 1996. (sec. 2262.1(a)).

(f) Gasoline being supplied from a Southern California terminal must meet the 7.00 psi RVP standard starting April 15, 1996. (sec. 2261(a)(1)(A)1.) As in the Northern California situation, section 2262.1(c)(1) creates an exception where the person supplying the gasoline from the terminal demonstrates it took precautions to assure that the gasoline will be delivered to a dispensing facility in an earlier northern air basin before May 1, or in a later northern air basin before June 1.

Gasoline being supplied anywhere in the distribution stream

(g) Gasoline being supplied at dispensing facilities (along with gasoline anywhere else in the distribution stream) must meet the 7.00 psi RVP standard on and after June 1, 1996, with two minor exceptions.

First, gasoline being dispensed at a dispensing facility is not subject to the standard where the facility operator demonstrates that any exceedance of the standard was caused by gasoline delivered prior to April 15, or prior to June 1 in the case of gasoline delivered from a bulk plant. (sec. 2261(a)(2).) Second, a dispensing facility in a later northern air basins is exempt if the operator can show that there have been no deliveries since May 17. (sec. 2262.2(c)(3).)

Prior ARB RVP standards

The ARB's prior RVP regulation, section 2251.5, has no effect on gasoline supplied in 1996.

96-7 Posted February 9, 1996

Question: In its capacity as a terminal, can a facility import CaRFG on the behalf of another company and have the owner of that gasoline to be responsible for compliance of the gasoline?

Answer: Yes. Where Company A owns out-of-state gasoline and arranges for it to be brought into California at a terminal owned and operated by Company B, Company A and not Company B will be treated as the importer of the gasoline if the following conditions are met:

- 1) Company B has a contractual agreement with Company A specifically designating that Company A, and not Company B, is the importer and is responsible for compliance with the standards for imported gasoline.
- 2) The ARB's Compliance Division is advised of this agreement in advance.
- 3) The imported gasoline is physically segregated at the terminal facility such that the ARB's Compliance Division can enforce the standards and requirements applicable to imported gasoline when it is supplied from the import facility.

Provided all these conditions are met, the ARB would recognize Company A,

and not Company B, as the importer subject to the limits applicable to imported gasoline being supplied from the import facility.

95-6 Posted February 2, 1996

Question: Do the CaRFG regulations impose any requirements on a refiner who produces gasoline at a California refinery for sale and use outside California?

Answer: Yes. The requirements are contained in section 2270(c), which states:

(c) In the event a producer or importer sells, offers for sale, or supplies, in California, gasoline which the producer claims is not California gasoline, such gasoline shall be presumed to exceed the standards that would be applicable pursuant to this subarticle if it was California gasoline. The producer shall maintain, for two years from the date of any sale or supply of such gasoline, records demonstrating that the gasoline was not California gasoline, or that it complied with all of the standards of this subarticle 2, when it was sold or supplied by the producer.

If a producer fails to maintain records showing that gasoline shipped from a California refinery was not California gasoline because it was transported out-of-state for use out-of-state, the ARB will treat the gasoline as subject to the CaRFG standards.

95-5 Posted February 2, 1996

Question: What Reid vapor pressure (RVP) must gasoline sold at Northern California service stations meet between May 1 and May 31, 1996.

Answer: No ARB RVP standard applies to gasoline being sold from Northern California service stations between May 1 and May 31, 1996. The ARB's RVP season for gasoline downstream from the refinery or import facility starts May 1 in the San Francisco Bay Area, San Joaquin Valley, Sacramento Valley, Mountain Counties and Lake Tahoe Air Basins, and starts June 1 in the remaining Northern California air basins. (Title 13, California Code of Regulations, section 2262.1(a)(2).) However, section 2261(a)(1)(A) provides that the CaRFG downstream RVP standard does not apply to transactions directly involving the fueling of motor vehicles at a retail outlet until June 1, 1996. This means that gasoline at a California service station being sold or offered for sale for fueling motor vehicles does not have to meet the CaRFG RVP standard until June 1, 1996. The ARB's pre-existing 7.8 psi RVP standard applied in the five Northern California air basins starting May 1 of each year, but section 2251.5(e) sunsets that standard as of March 1, 1996.

Deliveries of gasoline to service stations in the five Northern California air basins listed above, except for deliveries from a bulk plant, are subject to the 7.0 psi standard starting May 1, 1996. Gasoline shipped from refineries in the five Northern California air basins must meet the 7.0 psi standard starting April 1, 1996. As a practical matter we expect that most gasoline at Northern California service stations will have an RVP at or below 7.0 psi in May 1996.

Gasoline sold at Northern California service stations during May, 1996 will be subject to RVP standards administered by the Division of Measurement Standards within the California Department of Food and Agriculture. This gasoline will not be subject to the U.S. EPA's RVP standards as those standards do not apply at service stations until June 1. (40 C.F.R. sec.

80.27(a)(2).)

95-4 Posted February 2, 1996

(See EPA Q&A 1/23/95 below for further info to 95-4)

Question: EPA recognizes tank sampling from taps without "stingers" as acceptable, provided Appendix D criteria are met. Will CARB accept this practice including the 0.6 API stratification criteria per EPA Q&A 1/23/95?

Answer: The ARB sampling procedure, Section 2296, states that alternative sampling procedures may be used if a mutually satisfactory agreement has been reached by the parties involved and such agreement was put in writing and signed by authorized officials. Thus, the ARB may enter into a sampling protocol with a company which states that both parties agree that a sample obtained from a tank tap without a "stinger" is a representative sample of the product in that tank.

Unless persuading information is provided to the ARB, the ARB does not anticipate including a 0.6 API stratification limit as stated in the EPA Q&A 1/23/95. The ARB expects that the gasoline in the tank (above low pump-out) is adequately mixed so that samples obtained at any level in the tank will meet the specifications of the appropriate compliance option, be it flat, DAL, alternative formulation, predictive model, etc.

EPA Q&A 1/23/95

EPA RFG/ANTI-DUMPING QUESTIONS AND ANSWERS, JANUARY 23, 1995

SAMPLING AND TESTING PROCEDURES

1. Question: How should storage tanks be sampled for RFG?

Answer: Section 80.65(e)(1) of the regulations states that "[e]ach refiner or importer shall determine the value of each of the [reformulated gasoline] properties for each batch of reformulated gasoline it produces or imports prior to the gasoline leaving the refinery or import facility, by collecting and analyzing a representative sample of gasoline taken from the batch." "Batch of reformulated gasoline" is defined at

80.2(gg) as "a quantity of reformulated gasoline which is homogeneous with regard to those properties which are specified for reformulated gasoline certification."

Samples that accurately represent batch properties are necessary in order to determine if RFG standards are being met. Therefore, the first concern of batch sampling is to determine whether or not the tank contents are homogeneous.

Gravity analyses of upper, middle, and lower samples is an appropriate means of establishing tank homogeneity. EPA would consider a tank to be homogeneous where the maximum difference in tested gravities between any two samples from different tank strata is no greater than 0.6 API, unless there is reason to believe the tank contents are not mixed in spite of such gravity test results. For example, if samples from a storage tank have noticeably different colors, the gasoline in the tank should not be considered homogeneous even if the samples have gravity tests that are within the 0.6 API range. If a question remains about whether the contents of a storage tank are fully mixed following gravity testing the party could resolve the homogeneity issue by conducting tests on the upper, middle and lower tank samples for

benzene and oxygen. (Tank homogeneity could be established using benzene and oxygen tests on upper, middle and lower tank samples without the need for gravity testing.) EPA would consider a tank to be homogeneous if the maximum difference in benzene tests is 0.10 vol% and the maximum difference in oxygen tests is 0.15 wt%. The benzene and oxygen testing to establish homogeneity (as opposed to certification testing) could use a non-regulatory method such as mid-infrared analysis.

Where it is found that tank contents are not homogeneous, further mixing should be performed before collecting a representative sample for reformulated gasoline analysis.

Product stratification should also be avoided downstream of refiner or importer facilities, because samples must meet the downstream "per gallon" standards, and stratification could result in a portion of the gasoline in a tank being out of compliance with "per gallon" standards. For further discussion of homogeneity, see the Independent Sampling and Testing Section, Question 20 of the July 1, 1994 Question and Answer Document).

Storage tanks should be sampled according to 40 CFR part 80, Appendix D, using the method that will best represent the contents of the tank or batch. EPA expects the refiner, importer, or independent laboratory to use its best professional judgment in determining the procedures that are necessary in order to best represent a given batch within the guidelines of Appendix D.

EPA preference for sampling storage tanks is a "running" or "all-levels" sample collected from an un-confined (no gauge tube) roof port. A "running" or "all levels" sample collected from a

perforated gauge tube is the next best choice. In no case should a sample be collected from a solid gauge tube.

EPA prefers to collect "running" samples as opposed to "all-levels" samples for two reasons. First, assuming both "all-levels" and "running" samples are collected with uniform lowering and retrieval rates, the "running" procedure achieves better representation of the tank contents than the "all-levels" procedure. This occurs because with the "running" procedure, one half of the sample is collected when lowering the apparatus, and the column sampled is undisturbed at that point. The second reason is that "running" samples are easier to collect than "all-levels" samples because the sample collector is not required to stopper the sample bottle.

If a tank cannot be bottle sampled from the top, then tap sampling is an appropriate substitute. For best representation, a single composite should be collected by proportionally filling the sample container from all available taps. If homogeneity is well documented, the entire sample may be collected from a single tap. If a refinery or importer tank has no roof sampling port or sampling taps, then a pipeline sample is the only other sampling means that is possible. Pipeline sampling is discussed in Question 2 of this section.

In the case of downstream quality assurance sampling from a storage tank which does not have a roof sampling port or taps for sampling, a sample collected from a truck or barge that has just loaded from that tank is marginally acceptable. The truck or barge should be completely empty before loading, and a "running" sample should be collected from the truck or barge compartment.

Appendix D contains general instructions and precautions that must be followed when choosing sampling equipment and containers, and when collecting samples. RVP is the most sensitive reformulated gasoline property, relative to sampling, and therefore precautions to prevent loss of "light ends" must be followed carefully. Also, sampling containers must be clean and rinsed well with the gasoline to be sampled in order that the sample is not contaminated, for example, with trace amounts of heavy metals. When collecting tap samples, the tap and connecting piping must be completely flushed, and the sample container must be bottom filled strictly according to the procedure outlined in Appendix D. Always label the container as soon as possible, and note the location of the sampling point and method of collection.

95-3 Posted November 1, 1995

Question: A very critical part of meeting the tight CARB Phase 2 gasoline specifications is to calculate a blend target and release limit for each gasoline quality. To do this properly requires knowledge about the State enforcement mechanisms. Could you please explain the enforcement procedures used at refineries to us? In particular:

95-3a

Question: How will samples will be taken? How many?

Answer: ARB inspectors will obtain gasoline samples the sampling procedure in Section 2296, Motor Fuel Sampling Procedures. Generally, "running samples" or "all-levels samples" will be obtained from refinery and terminal tanks that have appropriate access from a sample hatch. "Tap samples" will

be obtained from those tanks that do not have hatches. "Nozzle samples" will be obtained from service station nozzles. As to how many samples will be obtained, the ARB inspectors generally obtains two samples--one to be used for RVP analysis and the other for all the other fuel analysis.

95-3b

Question: What tests will be run in the van? What test methods? How is off test determined in the van?

Answer: At the onset of the RFG Phase 2 regulations, except for olefin content and extremely low level sulfur content, all RFG parameters will be analyzed in the mobile laboratory using Section 2263 test methods. As of the beginning of October 1995, olefin content determinations have not been finalized. Low level sulfur determinations will be conducted at the Haagen-Smit Laboratory in El Monte. The low level sulfur method of analysis is contingent upon adoption of the proposed test method amendments being considered at the October 26, 1995 Board meeting. A sample is determined to be in violation ("off test") if the test result is greater than the regulation standard plus the enforcement tolerance. The enforcement tolerance is generally the reproducibility of the test method.

95-3c

Question: If off test in the van, what is the procedure? Is the refinery notified at this point? Is the sample sent to a stationary lab to be tested by the "official" methods? Is another sample taken? What exactly are the "official" test methods that will be used at the stationary labs?

Answer: If a sample is tested in the mobile laboratory and determined to be

in violation, the company will be notified as soon as possible (normally in the morning of the next business day) of the test results. Company personnel should presume that section 2263 test methods were used unless the ARB informs them that it was only a screen test result. Inspectors will return to the facility to resample the fuel to determine if the nonconforming gasoline is still being sold or supplied. The inspectors will try to track and sample the fuel upstream and downstream of the facility originally sampled (ie. service station, terminal, or refinery) to determine the extent of the violation(s). In those instances where the mobile laboratory is not equipped to run the 2263 test method, the sample will be forwarded to the stationary lab for that testing.

95-3d

Question: What reproducibility "R" is used for each parameter in determining if a sample is off test? Will the state publish a list of "R's" for each test method and update it if changes occur?

Answer: The reproducibility values will be based on the values which, after the adoption of the amendments being considered at the October 26, 1995 Board meeting, will in each case be stated either in the test method or the regulation incorporating the test method.

95-2 Posted November 1, 1995

Question: Under the current regulations pertaining to the Predictive Model (PM), a refiner could identify a different set of PM alternative specifications for each batch of gasoline supplied from the refinery as long as the proper notification is given, and no averaging banks are negative. A possible application of this would be a different set of PM alternative

specifications for each batch of premium and regular gasoline.

- (a) Would CARB allow a different PM formulation for premium and regular to be set up ahead of time? This approach would be environmentally neutral, totally enforceable, and save a lot of unnecessary notification and paperwork.
- (b) Extending this slightly, would CARB allow separate averaging banks to be maintained for premium and regular gasoline with different preset PM formulations?

Answer: (a) Where a refiner has been supplying final blends of gasoline from its refinery subject to a set of PM alternative specifications, the refiner must notify the ARB of the information identified in section 2265(a) in order to have a different set of PM alternative specifications apply to the next final blend. Section 2265(a)(4) authorizes the Executive Officer to enter into a protocol with the refiner on how these notifications are made. In appropriate circumstances, the protocol could address how a refiner will notify the ARB regarding the limits applicable to each final blend supplied from the refinery. For example, a refiner would notify the ARB that they are using one set of PM alternative specifications for final blends of regular gasoline and a second set of PM alternative specifications for final blends of premium gasoline.

(b) No. Once a refiner has elected to supply a final blend of gasoline from its refinery as a PM alternative formulation with subject to an averaging option for one or more properties, the refiner may not elect a different set of PM alternative formulations for any California gasoline being supplied from the same refinery unless all averaging debits are offset. (Section 2265(c)(2).)

95-1 Posted November 1, 1995

Question: In northern California, CARB gasoline with an RVP not exceeding 7.0 psi must be made at the refinery starting April 1 and be everywhere (terminal and service stations) by May 1 (section 2262.1(a)). The most recent amendments (section 2261(a)(1)(A)) indicate that the standards in section 2261.1(a) shall apply starting April 15, 1996 for terminals. Since this reference is to a RVP standard that starts May 1, we assume that for Northern California, terminals must have low RVP gasoline May 1 (not April 15)--that is one month after the refinery starts making it. Is this correct? If not, does CARB plan to fix it so more time can be given to transition the terminals?

Answer: Your assumption is correct. In 1996, the RVP standard applies to gasoline being supplied from a terminal on or after either (i) April 15 or (ii) the start of the applicable regulatory control period for the terminal under section 2262.1(a)(2), whichever occurs later. Thus the operative date for Bay Area terminals will be May 1. The same principle applies to the additional RVP standard imposed by section 2262.1(b) on shipments of gasoline from production or import facilities during the month preceding the start of the basic regulatory control period. Under section 2261(a)(1)(B), these additional standards apply starting March 1, 1996, which is also the earliest date on which the additional regulatory control period starts in any air basin. In 1996, these standards will apply to gasoline supplied from the production or import facility on or after the start of the applicable additional regulatory control period for the facility, which can range from March 1 to May 1 depending on the air basin.